

Certification Statement

February 28, 2008

Grafton Telephone Company CPNI Operating Procedures

Grafton has provided training to existing employees and will provide training to all new employees on the proper use and disclosure of (CPNI). Records of the training material and documentation of the attendance is kept on file. Any employee's noncompliance of Grafton's CPNI policies will be reported and appropriate disciplinary steps taken.

CPNI notification letters were sent to all customers explaining what CPNI is and asking customer to call office to set up a password and challenge question. When customer calls, no CPNI information is released without a password. When a customer comes in-store, a valid photo ID is required before releasing CPNI information. Grafton's billing company is also compliant with the CPNI regulations.

In the past year, no action taken against data brokers and no customer complaints received concerning unauthorized release of CPNI.